



39

40







EXHIBIT R

Honorable Jed S. Rakoff

This letter is in regards to Cesar Altieri Sayoc Jr.

My name is Justin Humberger. I will first thank you for taking the time to read these words. This letter is not to argue Cesar's innocence. I was completely blind to everything surrounding this scandal until I was smacked right in the face with it. I was swept up in a media whirlwind following this incident and an FBI investigation team even appeared at my front door step for a thorough questioning. But I am profoundly concerned for Cesar as a human being, and I only want to help and ask for a positive outcome for my former manager and business partner and current friend.

I first met Cesar back in 2015. From the first night I met him, till the last conversation we had on the phone as of 06/17/19, he has always talked about starting great businesses in order to provide a great future for the people around him. At this point it almost seems 100% delusional. I see this. I know this, but I don't think Cesar sees it.

During the entire time that I have done business with Cesar he has had an air of selfless professionalism, and he has always encouraged an open and honest forum for communication that I still find refreshing. The first night that I met Cesar he was four hours late picking us up, his new tour group; five angered individuals. He had overloaded the towing capacity to "the van." He did this for the sole reason that he wanted everything he had out of storage, in order to produce the best shows he could. We were on the road doing shows, dancing at clubs and playing music. He always made sure that we got paid each night; some nights out of his own pocket because some shows fell through. And he always found a way to "make it happen," no matter what and with an upbeat attitude.

Until now, I thought that ethics and honesty played a pivotal role in Cesar's decision-making skills. For one small example, on one tour everyone had noticed at one point or another, that one of the guys was a shoplifter. I confronted him in front of everyone on the highway, because he had slipped a hair brush in one of my bags for his later use. He and the other four individuals in the tour group did not see the overall repercussions this one man's actions could have had. He could've potentially ruined this endeavor for us all. But Cesar did see the consequences and because of this he had my back. He explained to everyone that if one of us got arrested for stupidity the show as a whole will be one man short. All the clubs were paying for a five man group plus an MC (master of ceremony). If a six-man team is one man short he could destroy the income of all six.

Maybe in a deeply flawed and a skewed way Cesar sees that the actions he took here had a moral purpose. I think Cesar was really out of his mind. He was delusional, he had to be. Between what has been revealed on the news, from interviews of other acquaintances who know Cesar, to information about the history of his life and his mental instability building up through the last few months up to everything unfolding it's hard to believe that Cesar ended up where he is today. But what I wish for, is that my friend should not be looked at as a monster, but as a human being with deep flaws, possibly mountainous flaws. Yes, justice must be served for the actions committed. But Cesar was in a delusional state and that was the primary catalyst that charged his actions.

Thank you for taking the time to read this letter. I don't know if it will strike a chord with anything regarding the matters at hand. Just know that my friend Cesar Sayoc is a man and not a monster.

Sincerely,

Justin Humberger

EXHIBIT S



UNCLASSIFIED//FOUO

FEDERAL BUREAU OF INVESTIGATION

Date of entry 10/27/2018

(U//FOUO) On October 27, 2018 PHILIP ETTORE COSTA, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] by Special Agent (SA) Irina Thomas and SA

John Thomas. Also present at the residence during portions of the interview was "Mindy", COSTA's wife. After being advised of the identity of the interviewing agents and the nature of the interview, COSTA provided the following information:

(U//FOUO) COSTA has been in the nightclub business since approximately the 1990s and has been a manager at "Solid Gold" and "Pure Platinum" in the past. Approximately two years ago, COSTA started working as a "dance counter" at Ultra Gentlemen's Club, 312 South Congress Avenue, West Palm Beach, Florida 33406 (hereinafter ULTRA). COSTA described "JOE" (JOE SACCAL) and "STACEY" (STACY SACCAL) as the managers of ULTRA.

(U//FOUO) COSTA was shown a photograph by SAs of CESAR ALTIERI SAYOC, date of birth 03/17/1962 (hereinafter SAYOC), who COSTA identified as "CESAR". COSTA did not know SAYOC's last name or much detailed information concerning SAYOC's relatives. COSTA was not aware of SAYOC's marital status nor if SAYOC had any intimate or romantic partners or other associates. COSTA showed SAs his (COSTA's) cellular telephone, where "CESAR" was listed under telephone number +1(828)279-1292.

(U//FOUO) COSTA described SAYOC as someone who "all the nightclub owners know" for over approximately 20 years. When COSTA was employed by Pure Platinum, SAYOC was known to COSTA as a nightclub worker and bouncer who drove a van, who at times dropped off people's laundry. COSTA had been told by other employees that SAYOC slept in his (SAYOC's) van.

UNCLASSIFIED//FOUO

Investigation on 10/27/2018 at WEST PALM BEACH, Florida, United States (In Person)File # 2660-NY-3005093, 2660-NY-3005093-MMDate drafted 10/27/2018by [REDACTED]

UNCLASSIFIED//FOUO

2660-NY-3005093

(U//FOUO) Interview of PHILIP ETTORE
Continuation of FD-302 of COSTA on 10/27/2018., On 10/27/2018, Page 2 of 6

(U//FOUO) Approximately two to three months ago, SAYOC appeared at ULTRA and met COSTA. COSTA explained that during this meeting, SAYOC was looking for a job at ULTRA because SAYOC had been working in North or South Carolina and had become tired with the cold. COSTA then put SAYOC in contact with JOE and STACEY, who later hired SAYOC as a bouncer. SAYOC's initial work schedule as a bouncer for ULTRA was the night shifts for Tuesday, Wednesday, and Thursday. However, ULTRA later lost a DJ (Disc Jockey) and gave SAYOC the role of MC (Master of Ceremonies), which also placed SAYOC on the work schedule on Friday and Saturday nights.

(U//FOUO) COSTA further described SAYOC as physically a "big guy" who was a health "nut" who often ate a high protein diet, many times consisting of broccoli and salmon. COSTA described SAYOC's van as white in color and that it looked like an "ice cream truck." COSTA further stated that SAYOC's van had a large attachment on the back bumper that extended approximately two meters and was covered with a black canvas material. COSTA once asked SAYOC what the attachment to the VAN was, and SAYOC told COSTA that it was where SAYOC kept his bicycles. Although COSTA had seen stickers on SAYOC's van, COSTA never entered SAYOC's van nor got "too close to it." COSTA never saw what was under the black covered extension of SAYOC's van.

(U//FOUO) COSTA explained that SAYOC would regularly "hang out" at ULTRA at very late hours, between 3 o'clock and 5 o'clock A.M., well after SAYOC's work schedule. Many times, SAYOC would be at ULTRA just "eating, always eating." At times, SAYOC brought broccoli and salmon to cook, which many employees complained about due to the smell. On one occasion, COSTA asked SAYOC where SAYOC lived. SAYOC told COSTA that he (SAYOC) lived at a house off "Cypress Creek" in "Pompano" and showed COSTA a photograph, from SAYOC's cellular telephone, of a house. SAYOC also told COSTA that he (SAYOC) went to the gym at 5 A.M. every morning. COSTA was under the impression that SAYOC lived alone.

(U//FOUO) On another occasion, SAYOC showed a photograph, from SAYOC's cellular telephone, where SAYOC, a woman described as SAYOC's mother, and

UNCLASSIFIED//FOUO

UNCLASSIFIED//FOUO

2660-NY-3005093

(U//FOUO) Interview of PHILIP ETTORE

Continuation of FD-302 of COSTA on 10/27/2018.

, On 10/27/2018 , Page 3 of 6

a person believed by COSTA to be a political figure, where at the same event together in Aventura, Florida. COSTA described SAYOC's mother as being involved in politics in Aventura. COSTA explained that SAYOC was in the photograph wearing a brown suit, which appeared to be the same suit that SAYOC had worn on many previous occasions at ULTRA. COSTA further described SAYOC as a "nice guy" who was "never mad" and was "always with a smile." COSTA described SAYOC as appearing to have "maybe a birth defect" with his (SAYOC's) right hand, as it always seemed unusually angled with curled fingers. Further, that it never felt that SAYOC's right hand gripped COSTA with any pressure during handshakes.

(U//FOUO) On Thursday, October 25, 2018, SAYOC was on shift at ULTRA from approximately 11:00 A.M. to 9:30 P.M. SAYOC later returned to ULTRA at approximately 2:30 A.M., carrying what appeared to be two (2) black "binders", and sat down at a table in front of COSTA's regular work desk, where COSTA also had a television turned on. Although ULTRA's interior club lighting was described as dim, COSTA observed SAYOC "flipping through" the binders and appearing to read the material by the light of SAYOC's cellular telephone screen. At one point, COSTA became curious and walked by SAYOC, who was engaged in viewing the binders' material. On a page of the items within the binder being reviewed by SAYOC, COSTA observed what appeared to be "hundreds" of "cut out" images of people's faces, which appeared to have been made into a collage onto the same sheets of paper. COSTA found the items to be disturbing and described them as something "that you see out of a movie that a serial killer would use." However, COSTA did not ask SAYOC about the material nor did he (COSTA) observe anyone else approach SAYOC while SAYOC was seated at the table with the material. COSTA later walked outside of ULTRA, accompanied by "LANCE" Last Name Unknown, who, although a gardener for ULTRA, was present that evening as a customer. While outside the front doors of ULTRA, LANCE suddenly yelled to COSTA, "Fire!" COSTA looked out to the parking lot of ULTRA and observed open flames next to SAYOC's van, with SAYOC standing beside the flames. COSTA expressed his surprise and confusion to LANCE as to the purpose of the fire and explained that SAYOC would get fired if SAYOC continued. LANCE told COSTA that SAYOC might be cooking food. COSTA then returned to his (COSTA's) desk overlooking the dance floor inside of ULTRA. SAYOC, smelling of smoke and carrying what appeared to be the same black binders described above, later returned and sat down at a table near COSTA. COSTA asked SAYOC what SAYOC had been burning, and SAYOC told COSTA that he (SAYOC) was burning his bills with credit card information. COSTA told SAYOC not to burn things at the ULTRA

UNCLASSIFIED//FOUO

UNCLASSIFIED//FOUO

2660-NY-3005093

(U//FOUO) Interview of PHILIP ETTORE
Continuation of FD-302 of COSTA on 10/27/2018. , On 10/27/2018 , Page 4 of 6

parking lot again. SAYOC then proceeded to review the material in the black binders, occasionally tearing items out to discard in the ULTRA trash cans.

(U//FOUO) Later that evening, after COSTA observed SAYOC's unusual activities, COSTA approached JOE at JOE's upstairs office at ULTRA. During this encounter, COSTA told JOE about the unusual binders that SAYOC had as well as SAYOC's activities at the ULTRA parking lot. COSTA joked with JOE, "what is this guy, the bomber?" JOE and COSTA laughed off the notion as absurd. COSTA also joked with STACEY about SAYOC's unusual activity. COSTA then returned to his (COSTA's) floor desk, where SAYOC continued to be seated nearby, and watched television (TV), where the news station was broadcasting news about the recent "mail package bomber." COSTA complained to SAYOC about the "bomber" being shown on the TV program, and "ripped into" the TV, asking "who would do this?" COSTA continued to berate the TV, saying "whoever would do this, they should kill him, that son of a bitch." While COSTA continued to disparage the news of the "bomber", SAYOC remained seated watching the TV program, not uttering a comment and only nodding his (SAYOC's) head. COSTA, followed by SAYOC, then went to Dunkin Donuts®, located across the street from ULTRA, to get some coffee. Upon returning to ULTRA, COSTA, JOE, JAMIE Last Name Unknown (DJ for ULTRA), and MARK Last Name Unknown (ULTRA Bartender), accompanied by SAYOC, went to the upstairs office of ULTRA to close out the evening's books. After closing out day's paperwork, all the employees departed ULTRA and the doors were locked. While JOE, JAMIE, MARK, and COSTA were leaving the parking lot, SAYOC, as he (SAYOC) walked to his (SAYOC's) van, called back, "Love you guys." COSTA stated that was the only time, as far as COSTA was aware, that SAYOC had expressed such a statement of feeling to ULTRA staff.

(U//FOUO) Although COSTA and SAYOC had each other's cellular telephone numbers, COSTA never regularly engaged SAYOC in telephone communication. COSTA possessed SAYOC's cellular telephone number solely for business emergency purposes and had minor telephone contact with SAYOC. However, SAYOC regularly sent political text messages to COSTA, which COSTA found annoying and deleted without response.

UNCLASSIFIED//FOUO

UNCLASSIFIED//FOUO

266O-NY-3005093

(U//FOUO) Interview of PHILIP ETTORE
Continuation of FD-302 of COSTA on 10/27/2018., On 10/27/2018, Page 5 of 6

(U//FOUO) Approximately two weeks ago, prior to the October 25, 2018, Thursday incident described above, SAYOC gave COSTA, JOE, and STACEY each a plastic bag containing a bottle of water and some "vitamins" described by SAYOC as to "boost health." COSTA kept those items in the trunk of COSTA's car and showed the items to SAs. SAs asked COSTA to keep the items undisturbed until the FBI had determined if any need existed to seize the items for evidentiary purposes. COSTA agreed to keep the items undisturbed in the trunk of his (COSTA's) car.

(U//FOUO) SAs asked COSTA if he (COSTA) had heard of someone named "BOBBY" that may have associated with SAYOC. COSTA did not recall anyone named "BOBBY" related to SAYOC or the subject of the interview.

(U//FOUO) COSTA has never been inside of SAYOC's home, nor has SAYOC been inside of COSTA's home. COSTA does not know if SAYOC is aware of COSTA's home address. COSTA has never been inside of SAYOC's van, nor has SAYOC been inside of COSTA's vehicles.

(U//FOUO) SAs offered FBI Victim's Assistance to COSTA should COSTA require their services. SAs also asked COSTA, should any suspicious package arrive at COSTA's residence, to not handle the suspect package and contact first responders to determine any potential risk. SAs provided COSTA with contact information should COSTA recall any additional pertinent information.

(U//FOUO) Original notes of the above interview will be maintained in the 1-A section of the file.

(U//FOUO) The above consensual interview was conducted within the living /dining room of COSTA's home with COSTA's wife present for periods of the interview. COSTA's wife was not interviewed. SAs were offered drinks by COSTA, which SAs declined. SAs were in plain clothes with no law enforcement equipment or weapons visible. Although it is unknown if SAs

UNCLASSIFIED//FOUO

UNCLASSIFIED//FOUO

266O-NY-3005093

(U//FOUO) Interview of PHILIP ETTORE

Continuation of FD-302 of COSTA on 10/27/2018., On 10/27/2018, Page 6 of 6

were recorded, COSTA's residence appeared to be equipped with exterior security cameras. No media appeared present at the location.

UNCLASSIFIED//FOUO

EXHIBIT T

Law Offices of
Donald R. Jones, P.A.
4090 Laguna Street, 2nd Floor
Coral Gables, Florida 33146
Tel: (305) 643-0330 • Fax: (305) 728-0537
E-Mail: djones@drjpa.com

April 29, 2019

Honorable Jed S. Rakoff
500 Pearl Street
New York, NY 10007-1312

Re: Cesar Sayoc

Dear Judge Rakoff:

My name is Donald R. Jones. I am a licensed attorney in Miami-Dade County, Florida and have been in practice for the past 30 years. I started my career as an Assistant State Attorney with Ms. Janet Reno. After completing my contract with her office, my main practice has been in the area of personal injury and wrongful death litigation.

I have known Mr. Cesar Sayoc for approximately twenty years. Since my first contact with him, I was amazed that someone with his appearance (muscular body type) was so docile and almost childlike. Over the years, I handled a few small civil matters for Mr. Sayoc. On one occasion, I learned that his father had abandoned him at a young age which significantly affected Mr. Sayoc's outlook on life. Shortly thereafter, he confided in me that he was shipped off by his mother to a Catholic boarding school in another state where he was repeatedly molested by one of the school's staff. I then contacted an attorney that was already handling a similar matter against that entity and a claim was made. Due to his ability to sufficiently verify the allegations Mr. Sayoc made, the case was settled.

I strongly feel that the above two circumstances have had a profound effect on this gentleman's life which led him to commit these criminal acts. Specifically, it is my belief that Mr. Sayoc found in Donald Trump a sort of surrogate father. During his involvement with the campaign events, he became more and more attached to the belief that

the cause of "making America great again" through Trump's election would somehow also include making the unfair world he had previously been exposed to by weak men in his life better. I know this must appear strange to you and me, but I do believe it to be a fact. My hope is that Mr. Sayoc will receive punishment for the wrong he has done, but with compassion from Your Honor to include psychiatric help with the hope that he can one day return to society and redeem himself. On this basis, I would ask Your Honor for leniency on his behalf.

If you should have any questions, please do not hesitate to contact my office at (305) 643-0330 or you can reach me on my mobile at ([REDACTED] [REDACTED]).

Very truly yours,

A handwritten signature in blue ink that reads "Donald R. Jones". The signature is fluid and cursive, with a large initial "D" and "J".

Donald R. Jones

ct
Enclosure